PART 75 - ENVIRONMENTAL ASSESSMENTS & REMEDIATION

75-1.1 INTRODUCTION

This section provides an overview of the process by which the Environmental Remediation Steering Committee operates; facility assessments, special studies, and remediations are prioritized and funded; FEDPLAN submissions; other related activities and the time frames of all the required actions. The following sections address specific portions of the environmental remediation activities.

The intent of this section is not be get into detail on how each activity process happens but to provide an overview of the whole to allow someone to understand the overall scope and process of the program. The specific sections for each of the parts of this process will provide a more detailed description of each of the individual activity processes.

75-1.2 DEFINITIONS

Environmental Remediation Steering Committee (SC) - The committee is tasked with managing the environmental remediation funding and actions at health care facilities. The committee consists of Area and Headquarters facilities and environmental health personnel. Committee responsibilities include determining project priorities and monitoring corrective actions.

Environmental Review/Assessments - There are NEPA requirements for Federal actions, such as the construction, modification of transfer of facilities.

Facility Assessments - A survey conducted to determine the environmental compliance and deficiencies of an IHS or Tribal facility.

FEDPLAN - The annual environmental plan submitted by an agency to the

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Environmental Protection Agency.

Finding - A specific item reported as part of a facility assessment. Generally these findings are items needing correction due to lack of compliance with regulations, laws or policies. However, these may also be examples of good management practices that are noteworthy or items that are not currently in violation but may or will be in the future due to poor management practices or changing regulations, laws, or policies.

Special Studies - A study of a specific finding in a facility assessment. Generally this is much more in depth look/investigation of a finding with more comprehensive testing and sampling, many times including the development of remediation plans and specification.

75-1.3 REQUIREMENT

As indicated in previous sections, this process is intended to bring IHS facilities into compliance with Federal laws, Executive Orders, Federal regulations, and other applicable criteria related to the environment.

75-1.4 PROCESS

The environmental remediation process involves a number of clear and distinct activities/pieces and processes that are overseen by the SC. The SC has laid out and approved the processes outlined in these guidelines.

The environmental remediation process consists of the following steps:

- facility assessment (including preassessments)
- C special studies (for some Findings)
- C remediation

The first step, the facility assessment (including the preassessment) is an overview of the environmental situation at a facility (the assessment). The second step involves a more detailed investigation of an assessment Finding (the special study). The third step is the actual remediation work itself (the remediation). Work always starts with the assessment activity followed by the others as needed depending on the findings of the assessment and recommendations of the special study. Funding for the follow-on special study and remediation are dependent on the availability of funding and the priority of the Finding in the facility assessment.

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A database will be maintained of all the Findings from the assessments and special studies. The database will indicate the resolution of all Findings. From this database the FEDPLAN will be developed. Information concerning the database is covered in the specific sections on each activity.

As indicated above, the following sections on each activity outline the method of requesting these activities, justification needed, funding limitations, responsibilities for each activity, etc.

A library of all assessments and special studies will be maintained. A copy of all reports will be sent to this library so that findings from these reports can be entered into the database.

Exhibit 1 is a calender giving the various actions needed, by which organizational element, at which time.

75-1.5 RESPONSIBILITIES

The ultimate responsibility for a facility and requesting of the funds is the local responsible official. This person is defined by the various laws. The responsible person may vary depending on organizational structure. However, failure to request funds or initiate action is one of the critical issues for liability.

The SC is responsible for program management, including guidelines, funds distribution, and conformance with environmental requirements.

Responsibilities for each action of each activity is indicated in the calender in Appendix A.

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APPENDIX A - Environmental Remediation Program Calender

Month	Action Item	Responsible	Follow up Action
January			
February	Request any new or unexpected environmental items for funding	SC Chair	Area - submit PSD
March	SC meeting to review status of program and program funding as needed	SC	HQ - distribute funds Area - execute facility assessments, studies, projects (ES if requested by Area) SC Chair - minutes
April			
May			
June	Conduct facility self- assessment/review to determine status of current findings, current remediation projects, and to assess the need for future projects	Area or SU	Update plans, programs etc. Prepare for submissions in following months
July	Request list of sites for next FY assessments including sites of property transfers	SC Chair	Area - submit list, indicate by in-house, contract, or extender
	Request PSD for next FY project funding including studies	SC Chair	Area - submit PSD
	Request update of findings indicating corrective action taken to update findings database	SC Chair	Area - mark findings report SC Chair - revised database
	Estimate costs of assessments for SC meeting	ES or Area	ES or Area submit to SC Chair
August	SC Meeting - determine assessments, studies and projects for next FY funding	SC	SC Chair- minutes other follow on actions in October

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Month	Action Item	Responsible	Follow up Action
September	Request update of FEDPLAN items and additional items for inclusion in FEDPLAN	SC Chair	Area - edit FEDPLAN report
October	Distribute funding for Steering Committee selected projects (or as soon as funds become available)	НQ	Area - execute assessments, studies, projects (ES if requested by Area)
	Update FEDPLAN to EPA	SC Chair	
November	Submit final reports on projects completed in last fiscal year	Area	Chair
December			
As Needed	Contract to provide assessments and special studies	ES	ES - scope, select, award
	SC meetings	SC Chair	SC Chair - minutes
	Assessments	ES or Area	ES or Area
	Special Studies	ES or Area	ES or Area
	Remediations	ES or Area	ES or Area

Note

Due dates for "Follow up Actions" to be determined. Some functions indicated 'SC Chair' will be performed by contract or agreement with other agencies.

Abbreviations

Area	IHS Area Facility Manager			
EPA	Environmental Protection Agency			
ES	IHS, DFEE, Engineering Services			
HQ	IHS Headquarters, Division of Facilities and Environmental			
	Engineering (DFEE)			
PSD	Project Summary Document			
SC	Environmental Remediation Steering Committee			
SC Chair	Environmental Remediation Steering Committee Chairman			
SU	IHS Service Unit Facility Manager			

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